UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

vs.

CR. NO.

Shelley Furtado

INDICTMENT

The Grand Jury charges:

COUNT ONE

CONSPIRACY TO COMMIT THEFT OF PROPERTY USED BY POSTAL SERVICE
[18 U.S.C. §§ 371, 1707, & 2]

Between in and around October 2006, to on and about December 22, 2006, in the District of New Hampshire and elsewhere, the defendant,

Shelley Furtado,

did knowingly and willfully combine, conspire and agree with Leon D. Rahaim, Robert L. O'Rourke, Richard J. Melcher and Matthew J. Lanz, to commit an offense against the United States, namely, to steal, purloin and embezzle property used by the Postal Service, the value of such property exceeding \$1,000.00, to wit, approximately \$10,486.00.

OBJECTS AND METHODS OF THE CONSPIRACY

The defendant, aided and abetted by Leon D. Rahaim, Robert L. O'Rourke, Richard J. Melcher and Matthew J. Lanz, and aiding and abetting Leon D. Rahaim, Robert L. O'Rourke, Matthew J. Lanz and Richard J. Melcher, agreed to and did travel to various U.S. Post offices in New Hampshire and Massachusetts, in order to steal U.S. Postal property, mostly postage stamps, intending that the

aforementioned stolen property would then be transported by one of the coconspirators to a "fence" in Boston, to be sold for the profit of the coconspirators.

OTHER OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of the conspiracy and to bring about the objects thereof, the defendant and his co-conspirators committed numerous overt acts, including but not limited to the following:

- A. Coconspirator **Richard Melcher**, constructed a folded newspaper rigged with two layers of tin foil in order to defeat detection of their planned thefts by anti-theft equipment in the Post offices, and instructed the other coconspirators in its use.
- B. On October 16, coconspirator Richard Melcher traveled to the U. S. Post Office at Woburn, Massachusetts, and being aided and abetted by coconspirator Matthew Lanz and appropriated postage stamps.
- C. On October 20, coconspirator Richard Melcher traveled to the U. S. Post Office at Woburn, Massachusetts, and being aided and abetted by coconspirator Matthew Lanz and appropriated postage stamps.
- D. On October 28, coconspirator Richard Melcher traveled to the U. S. Post Office at Woburn, Massachusetts, and being aided and abetted by coconspirator Leon D. Rahaim and appropriated postage stamps.
- E. On December 19, coconspirator Richard Melcher traveled to the U. S. Post Office at Salem, New Hampshire, and being aided and abetted by coconspirators Leon D. Rahaim and Shelley Furtado and appropriated postage stamps.
- F. On December 22, coconspirator Richard Melcher traveled to the U. S. Post Office at Salem, New Hampshire, and being aided and abetted by coconspirator Leon D. Rahaim and appropriated postage stamps.

All in violation of Title 18, United States Code, Sections 371,

1107 and 2.

A TRUE BILL

<u>/s/ Grand Jury Foreperson</u> Foreperson

August 29, 2007

THOMAS P. COLANTUONO United States Attorney

<u>/s/ Alfred Rubega</u>
Alfred Rubega
Assistant U.S. Attorney